

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
<b>THIS DOCUMENT RELATES TO: WAVE 8 CASES ON ATTACHED EXHIBIT A</b>	

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OPINIONS  
AND TESTIMONY OF OZ HARMANLI, M.D.**

Plaintiffs respectfully request that the Court preclude defense expert Oz Harmanli M.D., from giving opinions on: (1) the adequacy of Defendants' product warnings and IFUs, including opinions regarding what risks of the devices are "well known" to other doctors; (2) Whether Defendants' transvaginal mesh products are defectively or reasonably designed; (3) Any opinion regarding clinical differences between the mechanically cut and laser cut TVT mesh; (4) Any opinion regarding safety or efficacy of the mesh products observed in his own practice; and (5) the degradation of polypropylene or its clinical significance. The basis for Plaintiffs' motion is more fully set out in the accompanying Memorandum.

In support of this motion, Plaintiffs have submitted a memorandum of law and also rely upon the following attached exhibits:

- a. A list of applicable cases, attached hereto as Exhibit A.
- b. A true copy of Dr. Harmanli's General Expert Report on TVT and TVT-O attached hereto as exhibit B.

- c. A true copy of Volume 1 of Dr. Harmanli's 10-3-2018 deposition is attached hereto as Exhibit C.
- d. A true copy of Volume 2 of Dr. Harmanli's 10-3-2018 deposition is attached hereto as Exhibit D.
- e. A true copy of the FDA's blue book guidance on product labeling is attached hereto as Exhibit E.
- f. A true copy of the material safety data sheet (MSDS) for the polypropylene in Ethicon's prolene mesh products is attached hereto as Exhibit F.
- g. A true copy of Dr. Harmanli's CV is attached hereto as Exhibit G.

WHEREFORE, Plaintiffs respectfully request that the Court grant their Motion to Exclude the General Causation Opinions of Defense Expert Oz Harmanli, M.D.

Dated: October 18, 2018

Respectfully submitted,

/s/Jeffery M. Kuntz  
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**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing document on October 18, 2018 using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/ Jeffrey M. Kuntz  
**Attorney for Plaintiffs**